

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Christopher Friend	:	Chapter 13
	:	No.: 21-12884-MDC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY U.S. BANK, N.A.

Debtor, Christopher Friend, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by U.S. Bank N.A. submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtor asks for the chance to catch up.
7. Debtor opposes the same.
8. Debtor unsure of the same and asks for chance to catch up.
9. Denied. Debtor asks for the chance to catch up.
10. No objection.
11. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: April 27, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Rebecca A. Solarz, Esq.
Attorney for Movant *U.S. Bank, N.A.*
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: April 27, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
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